

Luke Breit

Personal Matters / Ex. 6

8/9/2018

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OFFICE OF THE  
EXECUTIVE SECRETARIAT

Mr. Andrew Wheeler  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington DC 20460

Dear Mr. Wheeler:

I am writing to express my objection to and concern about the Environmental Protection Agency's (EPA) "Strengthening Transparency in Regulatory Science" proposal (Docket ID No. EPA-HQ-OA-2018-0259). I believe that science plays a pivotal role in ensuring our health and safety, preserving our environment, and informing evidence-based policy. This new proposal would undermine the EPA's mission of preserving public health and the environment.

For the EPA to utilize the best available science to shape public health and environmental safeguards, the agency needs to have the ability to use the best research and information.

While this proposed rule promises "transparency," it reduces confidentiality and privacy protections by requiring the raw data from these studies to be made public. Consequently, the best available scientific studies in numerous public health fields, where patient privacy prohibits sharing the raw data, would be sidelined. This arbitrary rejection of data from research on air quality, public health, drinking water, hazardous waste, and so many other fields would inhibit the EPA's ability to implement science-based protections.

When policies play a role in our health, safety, and environment, the EPA needs to use the best available evidence and research when finalizing safeguards. This ill-advised proposal would significantly limit the EPA's ability to make the informed policy decisions that the agency is required to under landmark public health and environmental laws, including the Clean Air Act, Safe Drinking Water Act, and the Toxic Substances Control Act.

I urge you to reconsider this proposed rule and withdraw it immediately.

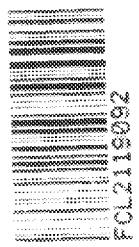
Sincerely,



Luke Breit

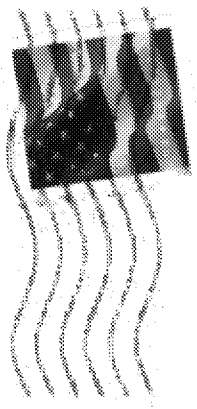
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Mr. Andrew Wheeler  
Environmental Protection Agency  
1200 Pennsylvania Ave, NW  
Washington DC 20460



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8/13/2018

Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington DC 20460

RE: Docket ID No. EPA-HQ-OA-2018-0259, Proposed Rule, "Strengthening Transparency in Regulatory Science"

Dear EPA Administrators:

I strongly oppose the proposed rule on "Strengthening Transparency in Regulatory Science" and urge the EPA to withdraw it. The proposed rule would make it harder to share important science, needlessly slow down scientific advancements, and put the health of our citizens and environment at risk.

While increasing the public availability of scientific data and models underlying regulatory science would be a step in the right direction, this rule would not achieve this goal.

If enacted, the proposed rule would prohibit the use of confidential data — like health studies — in EPA's rule-making processes unless that private information is made public. This policy would essentially bar the EPA from consulting most large-scale medical studies when creating rules about air pollution, toxic chemical, and water contaminants. Rather, the EPA should use the best available data and models available to it, regardless of whether these data and models are publicly available.

Additionally, if adopted, the proposed rule would make it harder, not easier, to share important scientific data by excluding studies that do not meet rigid standards set in place by this policy. Limiting the amount of science used in crucial decision making would be detrimental to the EPA's ability to ensure we have clean air and water.

Instead of leading to better or more transparent science, the EPA proposal is far more likely to lead to less science, more biased decision making and weaker public health and environmental rules. Due to these numerous issues, I urge the EPA to withdraw the proposed rule.

Sincerely,

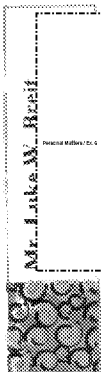


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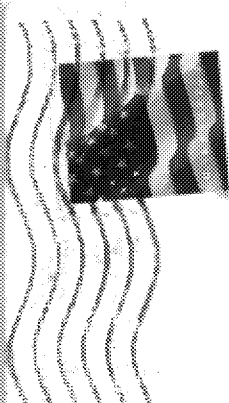
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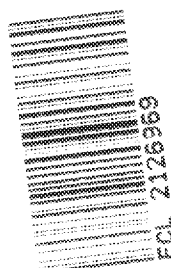
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EPA  
1200 Pennsylvania Ave. NW  
Washington DC 20460



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